

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
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VIA ECF

July 7, 2020

The Honorable Sarah Netburn, U.S. Magistrate Judge  
United States District Court for the S.D.N.Y.  
Thurgood Marshall U.S. Courthouse, Room 430  
40 Foley Square  
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs' Executive Committees ("PECs") write to respectfully ask that the Court approve the following requests related to upcoming briefing on several pending motions.

First, the PECs request, with the consent of the Department of Justice ("DOJ"), that the Court approve an additional one-day extension, to Friday, July 10, 2020, for Plaintiffs' Reply in Support of their Motions to Compel Directed to the FBI and Opposition to the FBI's Cross-Motion for a Protective Order. In addition, for Plaintiffs' combined Reply and Opposition, the PECs ask the Court's permission for an extension of the page limit by five pages, from 25 to 30 pages, to allow the PECs to address the combined reply and opposition in the single brief.

Second, the PECs request, with the consent of the Kingdom of Saudi Arabia, that the Court approve an extension from July 8, 2020, to July 15, 2020, for Plaintiffs' Reply to Saudi Arabia's Opposition [ECF No. 6298] to Plaintiffs' Motion for Reconsideration and Rule 72(a) Objections [ECF No. 6265] to the Court's May 27, 2020 Opinion and Order [ECF No. 6244].

The additional time for the two briefs has become necessary in part to accommodate the PECs' need to address the multiple briefs, particularly surrounding holiday schedules, and to coordinate plaintiffs' counsels' authorizations on the briefs. In addition, just yesterday, the FBI produced its Twelfth Tranche, including an additional more than 500 pages, much of it in Arabic. Although the PECs will not have sufficient time to translate and fully analyze the production before filing plaintiffs' brief on the FBI issues, the PECs have unexpectedly needed to divert resources to assess the general content of those documents.

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As the PECs previously agreed, the PECs consent to the DOJ's and FBI's proposal that this extension would not affect the aspect of the Court's previous endorsements, *see, e.g.*, ECF No. 6276, that the parties meet and confer within one week after submission of Plaintiffs' brief, to discuss an appropriate deadline for the FBI's reply. The PECs likewise also consent to a corresponding page length extension for the government's reply brief.

Respectfully submitted,

COZEN O'CONNOR

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For the Plaintiffs' Exec. Committees

cc: The Honorable George B. Daniels, via ECF  
All Counsel of Record via ECF